

The ARRL's petition assigned RM-10867 by the FCC requests that the number of amateur licenses be reduced from six to three. This comment deals only with that portion of RM-10867.

Actually there are only three currently active license classes – Amateur Extra, General, and Technician. It is true that, as of March 2004 there are still 80,966 Advanced and 32,337 Novice Class licensees, but at the time of restructuring in April 2000, there were 102,725 and 50,007, respectively. These numbers continue to fall. (See Chart I.)

There is no clear reason or apparent benefit to the amateur service to changing these records in the ULS database; only possibly increases in Commission costs.

Under the ARRL plan Advanced Class licensees would receive additional *unearned* privileges - 25 kHz on 80, 20, and 15 meter phone, and the lower 25 kHz CW on 80, 40, 20 and 15 meters. While some Advanced Class licensees would perhaps enjoy these privileges, some have commented that they prefer the “status” of an Advanced Class license. Others feel unearned upgrades are unjustified. The Commission should give serious consideration such comments¹.

I familiar with actions taken by other country's radio authorities and can find none that, as result of lowering or removing Morse requirements, have taken the unusual step of “forced updating” of their license databases. This action can and has been simply done by changing, when justified, the privileges of existing licensees. Nothing in the ARRL petition, that basically seeks to create lower entry requirements into the amateur radio service, justifies costs of modifying the ULS database.

Given time all Advanced and Novice licenses will either upgrade or expire. There is nothing in the ARRL petition impeded by the existence of these ULS database records. Furthermore the ARRL provides no evidence that giving these licensees greater privileges will improve the amateur radio service. I ask the Commission reject the ARRL's requests to (1) change the status of Advanced and Novice licensees in the ULS database and (2) to change their privileges in Part §97.301.

Joe Speroni, AH0A

¹ A few comments from ECFS on RM-10867

WO9LF – “Regarding merging all Technicians into General, and all Advanced into Extra, I am not in favor if it. I hold an Advanced Class license, and I do not want to be an Extra. If I want to be an Extra, I will go out and take the test, and I am sure that some Technician operators feel the same.”

W3BE – “This commenter takes issue with the petition's plan that would have the Commission upgrade our 84,563 Advanced Class operators to Amateur Extra Class without proving to our amateur service community that they are qualified to hold this -- our most prestigious class of operator license. To adopt this proposal would be highly unfair to our most dedicated and most highly qualified 107,313 Amateur Extra Class operators who have expended the time and effort to master the necessary qualifications. By climbing to the top, step-by-step, they have demonstrated their unqualified support for the objectives of our amateur service in our United States. Our Advanced Class operators -- for whatever reasons, have stopped short of the top rung of our ladder. To implement any such plan would diminish the reputation for excellence associated with our expert class. It would incur the disapproval of the very amateur operators who have so faithfully passed all of our examinations. It would, therefore, be detrimental to the future well being of our amateur service and for maintaining harmony and goodwill within our amateur service community. This commenter, therefore, asks respectfully for the Commission to dismiss this aspect of the proposal.”

W4LGH – “I am firmly against the proposals sent in by the ARRL and NVEC. As I do not believe in GRANDFATHERING anyone into a higher class without taking any additional written tests. I feel that both proposals are just giving Ham radio licenses away, and WILL NOT help ham radio in the long run, but WILL further it along the same lines that CB radio fell into. I have no issues with doing away with CW as a requirement, but feel that written exams should be taken and required to hold a valid license for the class they will hold. PLEASE do NOT just GIVE these license away.”

WY3D – “I totally oppose however any grandfathering to a higher license class under any conditions. It would be an insult to those of use who have worked hard earning our class of license. Grandfathering would do nothing to bring new people into the hobby. “

Chart I.
Advanced and Novice Licensees Since April 2000 Restructuring

